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September 17, 2002

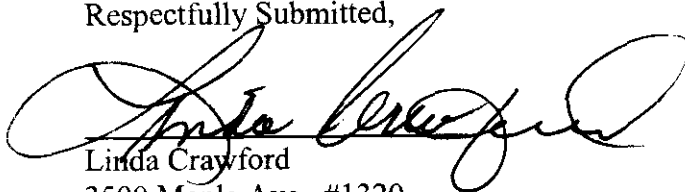
Ms. Marlene H. Dortch  
Office of the Secretary  
445 Twelfth Street, SW, TW-A325  
Washington, D.C. 20554

Re: Petition for Rule Making  
Comments for Premont, Texas (MB Docket No. 02-244)

Dear Ms. Dortch:

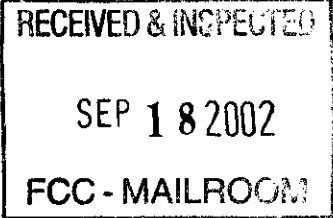
Enclosed is an original and four (4) copies each of Petitioner's Comments for Premont, Texas.

Respectfully Submitted,



Linda Crawford  
3500 Maple Ave., #1320  
Dallas, Texas 75219  
(214) 587-0668 Tele

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of 73.202 (b)	)	MB Docket No. 02-244
Table of Allotments	)	RM-10534
FM Broadcast Stations	)	
(Premont, Texas)	)	

To: John Karousos, Assistant Chief  
Audio Division of the  
Media Bureau

PETITIONER's COMMENTS

Petitioner respectfully submits....[set forth presentation in the petition]

Should this petition be granted, and Channel 287A be allotted to Premont, Texas, Petitioner will apply for Channel 287A and after it is authorized, will construct the new facility.

As the Commission is aware, this is one of a number of petitions filed by this Petitioner and other like-minded petitioners. The purpose of filing such petitions is to seek allotments to relatively small communities which are sufficiently removed from major metropolitan areas that there is no prospect that the allotment is merely a step to inaugurate still another facility serving a major broadcast market. These petitions seek allotments to relatively small communities in their own right. For reasons stated above, the instant petition merits the requested allotment under established principles in Section 307(b) of the Communications Act.

The filing of a number of similar petitions has its genesis in the recent development in radio broadcasting of Localized Network Programming. This is a concept that has been developed by the major broadcasters for essentially mid to major markets. It is an approach that provides the economy of a network but the feel and appearance of local programming. The belief of the Petitioner and like-minded petitioners is that such a plan will work with small market communities on a regional basis. Given a geographical area, such as Eastern Oklahoma, Western Oklahoma, North East Texas, West Texas, South Texas,

etc., the licensees of FM stations in small communities of a given region – whether the petitioners themselves or other licensees who might successfully outbid them for the license – could initiate unique network programming designed specifically for that region and additionally provide localized community inserts, such as local weather, local events, programming from specific remote locations, regional-specific news, public affairs, public service announcements, promotions and other programming giving life to the commission's policy favoring localism in broadcasting. While there would be local sales, the focus would also be in regional network sales, drawing on the advantages of advertising to the region and the unique nature of the region.

The vision is that providing radio service to an area of, say, 5,000 people may not allow for the operation of a traditionally run radio station. However, a network of ten stations in an identifiable geographic area covering, say, 50,000 people could very well be economically viable. This concept is an approach to providing radio service to clusters of stations in small communities in the nature of modern radio developed by the major group owners for mid and large markets. Such a concept - in lieu of allotting the frequencies to communities in or adjacent to major radio markets – provides a further public interest reason in support of the Petition under Section 307(b).

The like-minded petitioners who believe in this concept are: Charles Crawford, an executive in a major sales representative company with 25 years experience in broadcast sales; his sister, Linda Crawford, a co-worker with over 25 years of broadcast sales experience; Katherine Pyeatt, also a co-worker with over 10 years experience in Spanish broadcast sales and whose family has a long history in radio broadcasting; Robert Fabian, a co-worker and regional manager with more than 15 years experience in broadcast sales; Jeraldine Anderson, a long time resident of a small community of the type that would be served by this concept, also interested in Spanish broadcasting by virtue of her own Hispanic heritage; and Maurice Salsa, father-in-law of Charles Crawford, also of Hispanic heritage who grew up in a small town and is petroleum engineer by profession.

While these individuals exchanged views regarding the small market radio vision described above and also shared information concerning knowledge of FCC procedures and the like, each person is individually responsible for his or her petitions and only those petitions.

The information provided in these Comments is correct and true to the best of my knowledge.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Linda Crawford", with a long horizontal flourish extending to the right.

Linda Crawford  
3500 Maple Ave., #1320  
Dallas, Texas 75219  
(214) 587-0668 Tele

cc: Gene A. Bechtel, Law Office of Gene Bechtel, Suite 600, 1050 17<sup>th</sup> Street, N.W., Washington, D.C. 20036, telephone (202) 496-1289, telecopier (301) 762-0156, attorney for the Petitioner. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as the Petitioner.

September 17, 2002